

July 17, 2003

Mr. Mario Robles, Manager
Advanced Technology Licensing
U. S. Enrichment Corporation Inc.
6903 Rockledge Drive
Bethesda, MD 20817-1818

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE UNITED STATES
ENRICHMENT CORPORATION INC.'S LICENSE APPLICATION FOR THE
AMERICAN CENTRIFUGE LEAD CASCADE FACILITY

Dear Mr. Robles:

We have completed the initial technical review of the unclassified portions of the United States Enrichment Corporation Inc.'s (USEC's) license application and environmental report for the Lead Cascade facility, that were transmitted by letter dated February 11, 2003.

Our technical review has identified the need for additional information or clarifications as indicated in the attachment. Please submit responses to the requests for additional information and any license application and environmental report changes within 45 days of this letter. If you have any questions regarding these actions, I can be reached at (301) 415-8113.

Sincerely,

/RA/

Yawar H. Faraz, Project Manager
Special Projects Section
Special Projects and Inspection Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket: 70-7003

Enclosure: Request for Additional Information on
USEC Inc.'s License Application and
Environmental Report dated 2/11/03

cc: William Szymanski, DOE
James Curtiss, W&S
Rod Krich, LES

Dan Minter, SODI
Randall DeVault, DOE Oak Ridge
Michael Marriotte, NIRS

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OFC	SPIB*		SPIB*		SPIB*		SPIB			
NAME	YFaraz:dw		LGross		BSmith		KGibson			
DATE	7/ 15 /03		7/ 16 /03		7/ 16 /03		7/ 17 /03			

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Request for Additional Information on U.S. Enrichment Corporation Inc.'s Lead Cascade License Application and Environmental Report dated 2/11/03

LICENSE APPLICATION

Chapter 1, General Information

1. Please provide information applicable to the requirements of 10 CFR 40.38 and 10 CFR 70.40. The application should address foreign ownership, control, and domination of U. S. Enrichment Corporation (USEC) and whether a license issued would be inimical to the common defense and security of the United States and the maintenance of a reliable and economical domestic source of enrichment services.
2. In Section 1.1.1, please designate which buildings and areas within buildings, that are proposed to be part of the Lead Cascade project, will contain source or special nuclear material. Under 10 CFR 70.22(a)(2), an applicant must provide information describing the place at which the proposed activity involving source and special nuclear material is to be performed. The general information provided in Section 1.1.1 of the application does not clearly specify if source or special nuclear material will be used in these buildings or selected areas within the buildings.
3. Section 1.1.1 indicates that there are other PORTS facilities which will be used for effluent treatment, maintenance, environmental support, and waste management support. Under 10 CFR 70.22(a)(2), an applicant must provide information describing the place at which the proposed activity involving source and special nuclear material is to be performed. It appears that you are proposing to perform these support activities under the 10 CFR Part 76 Certificate? What is the legal basis for performing activities to be licensed under 10 CFR Parts 40 and 70 under the 10 CFR Part 76 Certificate. Please specifically identify the buildings and areas you propose to perform support activities under 10 CFR Part 76 in this section and provide your plan for licensing activities applicable to the Lead Cascade project under 10 CFR Parts 40 and 70.
4. In Section 1.2.5, p. 1-34, please either delete or provide sufficient justification for the exemption request. Also, make it specific to the Lead Cascade. For example, UF₆ product and tails cylinders will not be used and so should not be included in the exemption request.
5. Please make Table 1.2-2 consistent with the proposed uses of NRC-regulated materials at the Lead Cascade. For example, possession limits for transuranics is not included in Table 1.2-1, and yet Table 1.2-2 includes transuranics. Also, the table includes transportation of product and tails cylinders whereas the only cylinders that the rest of the application discusses are sample cylinders.
6. Please propose a license condition regarding when the Lead Cascade license would become effective. It cannot become effective until after the U.S. Nuclear Regulatory Commission (NRC) has completed its operational readiness and management measures verification reviews.

Enclosure

Chapter 4, Radiation Protection

1. Section 4.5. Explain how the requirements of 10 CFR 19.12 are incorporated into the Radiation Worker Training program.

The applicant is required to comply with the requirements of 10 CFR Part 19, including the instructions to workers requirements of §19.12. Neither Chapter 4 nor Chapter 11 of the application addresses these requirements.

Chapter 5, Nuclear Criticality Safety

1. Provide descriptions of the controls used to demonstrate that the limit of 700 grams of enriched uranium 235 (U-235) or the 10 percent enrichment level is not exceeded. In addition, describe the management measures that apply to these controls. The limit of 700 grams of enriched U-235 is the justification used for not providing a criticality accident alarm system (CAAS) as required by 10 CFR 70.24. Thus, the information requested is needed in order to determine that the 700 gm limit will not be exceeded and that the CAAS requirements of 10 CFR 70.24 do not apply. The limit is also the justification used that a criticality accident is not credible. Also, please address the possibility of inadvertent removal/leakage of depleted UF₆ from the cascade that could raise the enrichment level in the cascade to above the 10 percent limit. Thus the descriptions of the controls used to demonstrate that these limits are not exceeded are necessary.
2. Provide descriptions of how the operations involving 100 grams or more of U-235 are isolated from other operations. The application states that a Nuclear Criticality Safety (NCS) evaluation will be performed if the operation involves 100 grams or more of U-235. Thus, the requested information is needed to ensure that all the operations involving 100 grams or more of U-235 will be evaluated.
3. Please explain the interfaces and commitments of the NCS program and its controls, as referenced in Section 5.4.2, with the quality assurance program description (QAPD) requirements and controls, with items relied on for safety (IROFS) and management measures.
4. In 5.4.2, page 5-9, 5th paragraph, last sentence, clarify the basis and criteria for a Nuclear Criticality Safety Analysis to be a permanent or temporary document.
5. In Section 5, please confirm that the NCS computer codes are under the QAPD controls for software quality assurance (QA) and testing.

Chapter 7, Fire Safety

1. Delineate which position has the responsibility for developing, updating and executing the fire protection program. Clarify any overlapping roles and indicate if the Fire Services Manager reports to the Project Support Manager. Section 7.4.3.1 of NUREG 1520, Standard Review Plan (SRP) recommends that the application identify a senior-

level manager who has the authority and staff to ensure that fire safety receives appropriate priority. Section 7.0 of the license application indicates that the Project Support Manager has the responsibility for Lead Cascade Fire Safety. Also, Section 7.1.1 states that the fire protection program is under the direction of the Fire Services Manager.

2. Please commit to National Fire Protection Association (NFPA) 801-1998 *Standards for Facilities Handling Radioactive Material*, in its entirety or partially with appropriate justifications. Section 7.4.3.1 of the SRP recognizes compliance to NFPA 801 as an acceptable standard for management measures, fire prevention, emergency response, pre-fire plans and inspection, testing and maintenance of fire protection systems.
3. Please describe any deviations from NFPA 72, *National Fire Alarm Code*. Section 7.3.4 of the application states that the fire alarm system meets the intent of NFPA 72. Also, this section states that alarm announcements are not local. Nevertheless, there is the expectation of rapid fire emergency response. (For example, the redacted Integrated Safety Analysis (ISA) Summary states, "It could be argued that the building will be evacuated prior to the release.")
4. In Section 7.5.1 of the application, please clearly indicate which office provides fire protection engineering support. The first paragraph reads "Fire protection engineering support is available from the ... to evaluate fire hazards..." (This may be an editorial omission.)
5. Please clarify the role of off-site departments and indicate how they are notified. Section 7.5.2 of the application states that the site has mutual aid agreements with off-site area fire departments, and that alarms are not transmitted off-site. Also, indicate contingency plans (if any) when the USEC Fire Services group responds to off-site fires.
6. Please indicate whether a baseline needs assessment was performed for the fire department. If such an assessment was performed, then please include its results in Chapter 7 of the application. If such an assessment was not performed, then please provide the justification.
7. Please provide information that shows that the fire suppression system, which is identified as an IROFS, will withstand a 1000-year earthquake.

Chapter 8. Emergency Management

1. Section 8.1.2, page 8-3, 1st para. Table "1.2-2" should be Table "1.2-1."
2. Section 8.1.2, page 8-3, 2nd para. Table "1.2-3" should be Table "1.2-2."
3. Please describe the measures that will be taken to protect personnel in critical locations such as in overhead cranes or between the centrifuges in the X-3001 building.
4. Please commit to incorporating specific emergency management aspects of the Lead Cascade into the existing PORTS Emergency Plan. For example, the existing PORTS

Emergency Plan contains a list of hazardous chemicals that pertain to the gaseous diffusion process. Any hazardous chemicals associated with the Lead Cascade should be added to this list with a clear indication that the hazardous chemicals pertain to the Lead Cascade.

Chapter 9, Environmental Protection

1. Section 9.2.2.1.3. Clarify whether the secondary sample traps are collected and analyzed as air effluent samples and explain how the results are used to estimate quantities of radioactivity in air effluent.

Section 9.4.3.2.2(e) of NUREG-1520 states that, “the sample collection and analysis methods and frequencies are appropriate for the effluent medium and the radionuclides being sampled. Sampling methods ensure that representative samples are obtained using appropriate sampling equipment and sample collection and storage procedures.”

2. Section 9.2.2.1.3. Explain how sampler airflow would be adjusted to compensate for variable vent flow to maintain isokinetic linear air velocity in the sampler.

Section 9.4.3.2.2(e) of NUREG-1520 states that, “the sample collection and analysis methods and frequencies are appropriate for the effluent medium and the radionuclides being sampled. Sampling methods ensure that representative samples are obtained using appropriate sampling equipment and sample collection and storage procedures.”

3. Section 9.2.2.1.3. Describe the frequency of sampler and vent flow monitor calibration.

Section 9.4.3.2.2(e) of NUREG-1520 states that, “the sample collection and analysis methods and frequencies are appropriate for the effluent medium and the radionuclides being sampled. Sampling methods ensure that representative samples are obtained using appropriate sampling equipment and sample collection and storage procedures. . . Monitoring instruments are calibrated at least annually, or more frequently if suggested by the manufacturer.”

4. Section 9.2.2.1.3. Explain how alumina traps are stored and preserved to ensure no loss of uranium before the sample is analyzed.

Section 9.4.3.2.2(e) of NUREG-1520 states that, “the sample collection and analysis methods and frequencies are appropriate for the effluent medium and the radionuclides being sampled. Sampling methods ensure that representative samples are obtained using appropriate sampling equipment and sample collection and storage procedures.”

5. Section 9.2.2.1.3. Explain how the proposed vent sampling and analysis methodology accounts for particulate matter in the air effluent.

Section 9.4.3.2.2(e) of NUREG-1520 states that, “the sample collection and analysis methods and frequencies are appropriate for the effluent medium and the radionuclides being sampled. Sampling methods ensure that representative samples are obtained using appropriate sampling equipment and sample collection and storage procedures.”

6. Section 9.2.2.1.3. Justify the lack of air effluent monitoring of the building heating, ventilation, and air conditioning system, including the Process Area Ventilation System and Process Area Heating and Pressurization System that serves the X-3001 centrifuge bays and other occupied spaces (X-7725, X-7727H and X-3012).

The potential for leaks or media breakthrough in operating gas centrifuge hardware and feed, dump and sample carts poses a potential path for release of uranium to occupied spaces in the X-3001 centrifuge bays. Also, maintenance activities in X-7226 static stands are a potential source of airborne radioactivity. A gulper cart is described, but since proper function of this system relies on the correct placement of the collector/compound arm assembly, there appears a reasonable potential that a leak of uranium hexafluoride could by-pass the gulper. To meet the requirement of 10 CFR 20.1302(a), gaseous effluents from all operations associated with the plant, including such nonprocessing areas as laboratories, experimental areas, storage areas, and fuel element assembly areas, should be sampled (NRC Regulatory Guide, Regulatory Position C.2.1).

7. Sections 9.2.1.2.2 & 9.2.2.2.1. Clarify the role of the X-705 Liquid Waste Treatment facility in the treatment of Liquid Effluent Control (LEC) system waste.

In Section 9.2.1.2.2 of the application, the applicant states that the LEC system waste is treated at either the X-6619 STP or the X-705 Liquid Waste Treatment. However, Section 9.2.2.2.1 states that the LEC is treated at the X-6619 STP. It appears that the LEC may be sent to X-705 if the contamination is above acceptance criteria for X-6619. Please clarify the procedure for determining where LEC waste is treated. As stated in Section 9.4.3.2.1(2) of NUREG-1520, the applicant should describe and commits to use effluent controls (e.g., procedures, engineering controls, and process controls) to maintain public doses as low as reasonably achievable.

8. Section 9.2.2.2.1. Explain the procedure to be used to detect leaks in the underground tanks associated with the LEC.

As stated in Section 9.4.3.2.2(1)(k) of NUREG-1520, the applicant should describe how systems for detecting leakage from ponds, lagoons, and tanks are adequate to detect and ensure against any unplanned releases to groundwater, surface water, or soil.

9. Section 9.2.2.5. Clarify which quality control (QC) intercomparison program will be used by the applicant to ensure future analytical quality control.

As stated in Section 9.4.3.2.2(1)(h) of NUREG-1520, the applicant should describe how laboratory QC procedures are adequate to validate the analytical results.

10. Section 9.2.2.3.3. Update the status of the State of Ohio adoption of the federal exemption to the hazardous waste rules under 40 CFR 266 Subpart N.

As stated in Section 9.4.3.2.2(1)(n) of NUREG-1520, the applicant should describe how the applicant's procedures and facilities for solid and liquid waste handling, storage, and monitoring result in safe storage and timely disposition of the material.

Chapter 10, Decommissioning

1. Include all categories and details of the decommissioning cost estimate in page 2, Section 3.0 of the Decommissioning Funding Plan (DFP)

Section 3.1 in Appendix F of NUREG-1727 states that the decommissioning cost estimate should contain a substantial level of detail to allow NRC to fully evaluate the adequacy of the estimate. The guidance states that the cost estimating tables in Sections 3.4 through 3.18 contain sufficient detail and are likely to be acceptable to the NRC. The guidance states, "The NRC staff recommends that licensees pattern their cost estimates after the cost estimating tables presented at the end of this section."

Section 3.0 of the DFP containing the decommissioning estimate includes only a table of cost activities and the total estimated cost in 2002 dollars. Section 3.0 refers to Chapter 10 of the License Application for more detailed information. Chapter 10 of the License Application contains more discussion of the cost activities and how the estimated costs were calculated, but there are no details that allow NRC to fully evaluate their adequacy.

The DFP should be revised to include detailed cost estimates that include the information recommended in Section 3.1 and that are patterned after the tables presented in Sections 3.4 through 3.18 in Appendix F of NUREG-1727. This information should include:

- (a) descriptions of facility buildings and grounds (including number and dimensions of areas) that will require decontamination; number and type of components (e.g. fume hoods, ductwork, etc.) that will require decontamination; potential levels of contamination; and potential quantities of materials or waste requiring disposition.
 - (b) labor costs and non-labor costs.
 - (c) key assumptions used in the decommissioning cost estimate, including: details of planned surveys to be taken and decontamination efforts; the release criteria to be used for the licensed material; any key assumptions used to specify the information on facility building and grounds, dimensions, type and number of components that will require decontamination; costs for labor and non-labor; levels of effort for decontamination activities; and volumes and types of wastes generated. Also, additional information should be provided on the recent evaluation prepared by USEC concerning removal of the U.S. Department of Energy (DOE) centrifuges (including a reference, if available), and how these results form the basis for decontamination efforts at the American Centrifuge Lead Cascade.
2. Include details of records specified in 10 CFR 70.25(g) that are not addressed in Section 6.0 on page 4 of the DFP.

10 CFR 70.25(g) requires the licensee to keep records of information important to decommissioning of a facility, specifically on: spills and other unusual occurrences involving the spread of contamination; as-built drawings and modifications of structures and equipment; on certain areas within and outside of restricted areas of the facility; and on cost estimates, funding plans, and financial assurance documents. Section 1.5 in Appendix F of NUREG-1727

contains guidance on recordkeeping requirements.

In Section 6.0 of the DFP, USEC describes the records that USEC will keep that have a material effect on decommissioning. These include records on spills, as-built drawings and modifications, costs estimates for decommissioning, and decommissioning funding instruments. The discussions do not include some of the detailed information required on record keeping of spills and other unusual occurrences contained in 10 CFR 70.25(g)(1) and on certain areas within and outside the restricted areas of the facility contained in 10 CFR 70.25(g)(3)(i) through (iv).

The DFP should be revised to include radionuclide, quantity, form and concentration in the information that will be included in the records kept by USEC on spills and unusual circumstances as required by 10 CFR 70.25(g)(1). The DFP should be revised to state that specific information about restricted areas, areas outside of restricted areas where spills have occurred, areas where burials of waste have occurred, and all areas that require decontamination will be included in the records kept by USEC as required by 10 CFR 70.25 (g)(3) (i) through (iv). The DFP also should include the frequency of the updates to these records.

3. Include NRC recommended contingency or additional justification for contingency used in Section 10.10.1 of the License Application.

NRC recommends the use of a 25% contingency factor to be applied to the sum of all estimated costs to provide reasonable assurance for unforeseen circumstances that could increase decommissioning costs. The guidance at Section 3.1.2.3 of Appendix F of NUREG-1727 states that this percentage should not be reduced simply because unforeseen costs are low. NRC recommends the 25% contingency factor based on the analysis and guidance contained in NUREG/CR-6477, "Revised Analyses of Decommissioning Reference Non-Fuel Cycle Facilities."

Section 10.10.1 of the License Application states that the DFP applies a 15% contingency factor to the estimated costs for decommissioning that is used as the basis for the DFP.

The DFP should be revised to include a 25% contingency factor applied to the cost estimates used for calculating the required funds for decommissioning, or a detailed justification as to how a 15% contingency factor provides the reasonable assurance for unforeseen circumstances that is the basis for the NRC's preferred contingency factor of 25%.

4. Include the method for and reduce the frequency to 3 years of adjusting the cost estimates in Section 5.0 of the DFP.

10 CFR 70.25(e) requires the applicant to include the means for adjusting cost estimates and associated funding levels periodically over the life of the facility. Section 3.2 in Appendix F of NUREG-1727 recommends that the means include the method and the frequency by which the cost adjustments will be made. Also, in October, 2002, the NRC proposed to change its regulations to require licensees to update their decommissioning cost estimates every three years.

5. Revise Appendix B of the DFP to include an executed original of the standby trust agreement.

NUREG-1727, Appendix F, Section 4.4 contains a model Trust Fund Agreement intended to be used by the licensee to ensure that the terms and conditions acceptable to the NRC are included in the Trust Fund Agreement that is submitted by the licensee.

The DFP includes a model Standby Trust Agreement that repeats the model wording without any licensee-specific information. The format and content of the standby trust are adequate, however, specific information regarding the licensee and the trustee must be included in the final version.

The DFP should be revised to include a Trust Fund Agreement that includes: the name of the licensee; its corporate or partnership information, including the state it is incorporated in, if appropriate; the name, address, and phone number of the trustee; the Title 10, *Code of Federal Regulations* Part that is applicable to the Agreement (in all terms and conditions of the standby trust agreement that are applicable); the type of financial assurance instrument that is planned to fund the trust; signature blocks that are consistent with the licensee and trustee information; and Schedules A, B, and C that are consistent with the information provided above, including the amount of the trust fund and fees paid to the trustee. Since this DFP is part of a license application for a new activity, a condition should be included in the license that the executed original be submitted to the NRC prior to possessing licensed material.

6. Revise Appendix A of the DFP to include an executed original of the surety bond.

NUREG-1727, Appendix F, Section 9.4 contains a model Surety Bond intended to be used by the licensee to ensure that the terms and conditions acceptable to the NRC are included in the Surety Bond that is submitted by the licensee.

The DFP includes a model Surety Bond that repeats the model wording without any licensee-specific information. The format and content of the surety bond are adequate, however, specific information regarding the licensee and the surety must be included in the final version.

The DFP should be revised to include a Surety Bond that includes: the name and address of the licensee; its corporate or partnership information, including the state it is incorporated in, if appropriate; the name, address, and phone number of the surety and the type of organization and its state of incorporation, if applicable; the total penal sum of the bond based on the cost estimate in the DFP; the Title 10, *Code of Federal Regulations* Part that is applicable to the Agreement (in all terms and conditions of the surety bond that are applicable); and signature blocks that are consistent with the licensee and surety information. Since this DFP is part of a license application for a new activity, a condition should be included in the license that the executed original be submitted to the NRC prior to possessing licensed material.

Chapter 11, Management Measures

1. Administrative Controls
 - A. Availability and Reliability

The ISA Summary identifies several Administrative Controls that are Quality Level-1 (QL-1) IROFS. As such, these are single controls used to prevent or mitigate a high consequence event. Provide a general discussion about how these single IROFS are assured to be available and reliable to perform their intended safety functions over an extended period of operation. Specific Management Measures and how they are applied should be described.

Chapter 11 provides a description of how management controls are applied to the “hardware” aspects of IROFS and a generic description of the supporting programmatic aspects, such as procedure use and development, training and qualification of the operations and maintenance staffs, audits and assessments, etc. However, neither the ISA section, the ISA Summary nor the Management Controls section specifically address how a complex set of administrative controls identified as single IROFS are integrated together in a manner that assures the level of availability and reliability credited in the ISA. The methods used in ISA Summary, Appendix E, Event Frequency Development, can provide an acceptable qualitative approach.

B. Defense-in-Depth

The ISA Summary identifies several Administrative Controls that are QL-1 IROFS. As such, these are single controls used to prevent or mitigate a high consequence event. Describe how the “defense-in-depth” principle is applied to these single IROFS.

Neither the ISA section, the ISA Summary nor the Management Controls section specifically address how the “defense-in-depth” principle required by 10 CFR 70.64(b)(2) is applied to the administrative controls identified as QL-1 single IROFS.

2. Procurement

Confirm that procedures will exist to direct procurement activities.

Section 11.7.5, “Examples of Records by SRP Chapter, Chapter 1.0 - General Information”, lists procurement records, including specifications for IROFS. However, Section 11.4.8, “Topics to be Covered in Procedures”, does not directly address procurement activities.

3. Exemption Requests

A. Review of Radiation Worker Training Program

Request an exemption from 10 CFR 20.1101(c) for the Radiation Worker Training program review frequency.

Section 11.3.6, “Radiation Worker Training”, states that “The Radiation Worker Training program is reviewed and evaluated every two years.” However, 10 CFR

20.1101(c) states, "The licensee shall periodically (at least annually) review the radiation protection program content and implementation."

B. Review of Radiation Worker Training Program

Clarify that the frequency of audits and assessments for health, safety and environmental programs applied to the review of Radiation Worker Training Program will be consistent with 10 CFR 20.1101, or request an appropriate exemption.

Section 11.5, "Audits and Assessments", states "The system [of audits and assessments] is designed to ensure comprehensive program oversight at least once every three years. However, 10 CFR 20.1101(c) states, "The licensee shall periodically (at least annually) review the radiation protection program content and implementation."

C. Follow-up Written Report

Request an exemption from 10 CFR 70.50(c)(2) for submitting follow-up written reports within 60 days.

Section 11.6.6, Follow-up Written Reports, states "The follow-up written report is forwarded to the NRC..., with the exception the follow-up written reports required by 10 CFR 70.50(c)(2) are submitted within 60 days. This exception to the reporting requirements requires an exemption from 10 CFR 70.50(c)(2), consistent with the exemption granted to the gaseous diffusion plants."

4. State that participants of an investigation team are assured of no retaliation for participating in investigations.

SRP Section 11.4.3.61(C)5 states that participants of an investigation team are assured of no retaliation for participating in investigations. The applicant does not address this in Section 11.6.5 of the license application.

5. Clarify when record revisions necessitated by post-failure investigations will be made.

Section 11.6.7 of the application states, "Record revisions necessitated by post-failure investigation conclusions are made promptly in accordance with 10 CFR 70.62(a)(3)." The staff acknowledges the applicant is meeting the regulation, however, SRP Section 11.4.3.7 states, "Record revisions necessitated by post-failure investigation conclusions should be made within 5 working days of the completion of the investigation (10 CFR 70.62(a)(3) states "promptly")."

6. Section 11.1, Configuration Management

Please state in the appropriate section(s) of Section 11.1 that all changes will be subject to and controlled by the configuration management (CM) system, process and procedures. Section 11.1.1.1, Control of Changes to the Physical Facility, commits to a

change control process for IROFS and supporting systems and components. Each change to the site, structures, processes, systems, equipment, components, computer programs, and activities of personnel, and not just IROFS and supporting systems and components, must be evaluated, implemented, and tracked by the licensee's CM system as required by 10 CFR 70.72.

7. Section 11.5. Audits and Assessments

In Section 11.5, commit to ensuring comprehensive program oversight of every major Lead Cascade activity, function and area that is significant to safety and environmental protection at least once every year instead of the stated three years.

ENVIRONMENTAL REPORT

1. Provide a copy of DOE/OR-861, dated October 1, 1985.

Staff requires a publically-available reference for the administrative record of the Environmental Assessment that describes the total electricity demand of an American Centrifuge Commercial Plant. This data is used to compare with the demand associated with continued operation of a commercial Gaseous Diffusion Plant, which is an impact of the no action alternative.

2. Provide background groundwater sampling and analysis data for uranium-235, uranium-238, total uranium, technetium-99, gross alpha radioactivity, gross beta radioactivity, trichloroethene, and chromium.

Staff requires background data on PORTS groundwater to adequately characterize the affected environment at PORTS. The Portsmouth Annual Environmental Report for 2001 (DOE/OR/11-3106&D1) does not include these data.